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Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

JUN 1 - 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Performance Measurements and)
Reporting Requirements)
for Operations Support Systems,)
Interconnection, Operator Services,)
and Directory Assistance)

CC Docket No. 98-56

To: The Commission

COMMENTS OF EAST ASCENSION TELEPHONE COMPANY, INC.

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June 1, 1998

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COMMENTS OF EAST ASCENSION TELEPHONE COMPANY, INC.

East Ascension Telephone Company, Inc., hereinafter referred to as "EATEL," through undersigned counsel, hereby responds to the request by the Federal Communications Commission ("FCC") for comments with regard to the methodology proposed by the FCC to analyze whether new providers of local telephone service are able to access, among other things, the support functions of incumbent local telephone companies. Specifically paragraph 131 of the Notice or Proposed Rulemaking in CC Docket No. 98-56, released April 17, 1998, requests that rural, small, and mid-sized local exchange companies provide comments with regard to the costs and burdens of such proposed performance standards. Additionally, the FCC requested suggestions as to possible modifications of these proposed guidelines to accommodate the unique circumstances faced by many rural, small or mid-sized local exchange companies. EATEL respectfully requests that the Federal Communications Commission carefully consider the impact of these reporting requirements on rural, small and mid-sized incumbent local exchange carriers.

I. SUMMARY

EATEL provides service as an incumbent local exchange company in Livingston and Ascension Parishes in the state of Louisiana. To date, EATEL has not received a bona fide request for interconnection, services, or network elements. EATEL provides telephone service to fewer than 50,000 access lines. Much of EATEL's service area is rural in nature. The hope of competition for residential customers in these areas is far from being a reality. Therefore, EATEL submits that these proposed standards should reflect the necessity for consideration by the respective state public utility commission of the individualized circumstance of each rural, small, or mid-sized incumbent local exchange company.

II. ABILITY OF RURAL, SMALL AND MID-SIZED ILECS TO MEET PROPOSED REQUIREMENTS

Many of the challenges faced by rural, small, and mid-sized incumbent local exchange companies involve a limitation of internal resources. In the past, these companies have focused on providing quality service to their customers within their franchised local service area. Until recently, little consideration was given to developing systems which allow for resale of service, unbundling of network elements, or interconnection of facilities. EATEL has historically focused on serving its own customers and meeting the needs of its own customers, not the needs of potential competitive providers.

Many of EATEL's internal processes, including billing and customer service functions, are not currently designed to meeting the demands of a competitive local exchange marketplace. With regard to the model rules proposed by the FCC in this docket for measuring various parts

of the process of resale or interconnection, systems would have to be developed or current systems would have to be substantially modified to provide the required information. The costs of developing such systems would be staggering in comparison to the number of customers in EATEL's service area. In addition, EATEL would sacrifice the quality of its customer service to its current customers to meet the needs of its new customers, i.e. the competitive local exchange companies.

III. SUGGESTED MODIFICATION TO PROPOSED MEASUREMENTS

The FCC requested comment on modification to the proposed guidelines. EATEL contends that references should be made in these proposed guidelines allowing the consideration of the specific situation of each rural, small, and mid-sized ILEC, much like the provisions for exemption, suspension or modification to the requirements of Section 251 of the Telecommunications Act of 1996.¹ These sections provide for state commission determination for exemptions, suspensions, or modifications of the various obligations contained in Section 251 on a case by case basis. The state commission are in the best position to make such determinations based on the knowledge of the myriad of issues affecting each rural, small and mid-sized incumbent local exchange company in that state. Such an approach would provide consistency between these proposed model rules and the Telecommunications Act of 1996. In addition, it would allow the development of rules contemporaneously with the introduction of competition in each rural, small or mid-sized incumbent local exchange service area.

¹ 47 USC 251(f)(1) and 47 USC 251(f)(2) as amended by the Telecommunications Act of 1996.

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IV. CONCLUSION

EATEL respectfully requests that the FCC consider the limitation of resources and individualized set of circumstances facing each of the rural, small or mid-sized incumbent local exchange companies in the United States. Though these proposed model rules provide a solid basis for state commissions to develop the rules to be applied to measure performance of incumbent local exchange companies, EATEL respectfully requests that these model rules recognize the need for individualized analysis of circumstance, resources, burdens, and costs of imposing such reporting requirements on rural, small and mid-sized local exchange companies.

Respectfully Submitted,

Janet Britton

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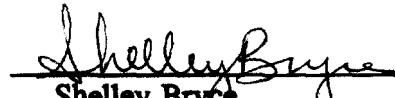
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CERTIFICATE OF SERVICE

I, Shelley Bryce, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC 20037, hereby certify that a copy of the foregoing "Comments of East Ascension Telephone Company, Inc." was served on this 1st day of June, 1998, by hand delivery to the following parties:


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